

Message

From: Henning, Gregory (SUF) [/O=COMMONWEALTH OF MASSACHUSETTS/OU=MASSMAIL-01/CN=RECIPIENTS/CN=GREGORY.HENNING]
Sent: 1/3/2010 6:13:01 PM
To: grants.bpd@cityofboston.gov; Ross, Michael [RossM.bpd@cityofboston.gov]; quinnpa.bpd@cityofboston.gov; flahertyse.bpd@cityofboston.gov; Donga, William [DongaW.bpd@cityofboston.gov]; baileyg.bpd@cityofboston.gov; feeneyw.bpd@cityofboston.gov; charbonnierr.bpd@cityofboston.gov; keaveneyj.bpd@cityofboston.gov; petersont.bpd@cityofboston.gov
CC: Saunders, Della (DPH) [/O=COMMONWEALTH OF MASSACHUSETTS/OU=MASSMAIL-01/CN=RECIPIENTS/CN=DELLA.SAUNDERS]; Corbett, Kate (DPH) [/O=COMMONWEALTH OF MASSACHUSETTS/OU=MASSMAIL-01/CN=RECIPIENTS/CN=KATE.CORBETT]; Khan, Annie (DPH) [/O=COMMONWEALTH OF MASSACHUSETTS/OU=MASSMAIL-01/CN=RECIPIENTS/CN=ANNIE.KHAN]; Truta, Ioan [TrutaI.bpd@cityofboston.gov]; Brazalovich, Sharon [BrazalovichS.bpd@ci.boston.ma.us]; cainesr.bpd@cityofboston.gov
Subject: Com v. [REDACTED] TRIAL 1/4/10 - 1/8/10 - LOGISTICS

Ladies and Gentlemen

Happy new year, I hope all is well with you and your families.

I'm emailing to remind you of a few things and to request a couple of items in anticipation of tomorrow's trial:

DCU Guys:

1. **Evidence:** please be sure to request all evidence from all sources, including drug depository, the evidence management people at Hyde Park (keys, phone, cigarette pack found on buyer), and ballistics (firearm and ammo)

2. **Booking sheet:** please bring a fresh copy of the booking sheet AND arrest booking form for [REDACTED] [REDACTED] want to make sure of the items that were found (and what was not found) on both of them after the distribution arrest, and to put into evidence that Lee said at booking that he was "unemployed" (Paul, did you hear this?).

3. **Expert Prep:** Billy Donga is our expert witness. I want to make sure he has a chance to come in to see the drugs, the physical evidence, the photos, and therefore have a factual basis from which to base his opinion. Please make sure you coordinate with him so that he has time to inspect everything.

I have an outline/playbook for your testimony that I can provide you tomorrow when you come to court. Ideally, I'll see you a little before 9 in the grand jury and I'll steal a prep room for you guys to settle into during the week. Please **call me** if you anticipate any problems: 617-504-2707.

Latents / Ballistics

Ioan and Det. Caines (and Sharon, though as I said I think it's unlikely you end up getting called),

I anticipate calling you guys after the 5 primary police witnesses are called. I won't know if this will be Tuesday or Wednesday (or beyond), but I will keep you posted. Ioan, I have your cell phone; Det. Caines, if you could email me your cell phone number I would appreciate it - that way I can be sure to keep in touch with you as things progress.

Witness List:

As of right now, I am expecting to call witnesses in the following order:

Shawn Grant
Sean Flaherty
Michael Ross
Paul Quinn
Billy Donga - DRUG EXPERT
Ioan Truta (and Sharon Brazalovich, if need be) - LATENTS
Det. Richard Caines - BALLISTICS
(Kate Corbett, Della Saunders, Annie Khan - all on the same day)

If the need arises:

Sgt. Det. William Feeney
Lt. Gerard Bailey
Todd Peterson

If scheduling breaks down and we need to accomodate the 3 drug lab witnesses, we can take them out of order individually, or squeeze them ahead of latents and ballistics.

ROOM ASSIGNMENT

We were originally scheduled to be in Room 816 before J. Fabricant. However, I think it's likely that we'll be moved (possibly to Room 907 before J. Quinlan). Please **keep in touch with me or the DCU officers on the case** so that I can let you know what room we're going in.

Thank you all for your help. I appreciate it, and I look forward to seeing you this week.

Best,

---greg henning

617-504-2707